

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

JONATHAN CARRERO and
AUBREY J. CARRERO,

Plaintiffs,

COMPCARE HEALTH SERVICES
INSURANCE CORPORATION,

Involuntary Plaintiff,

v.

MARK E. TESSENDORF,
C.H. HALL TRUCKING INC., and
AEGIS SECURITY INSURANCE COMPANY #33898,

Defendants.

NOTICE OF REMOVAL

TO: ALL COUNSEL OF RECORD

Defendants, Mark E. Tessendorf, C.H. Hall Trucking Inc., and AEGIS Security Insurance Company #33898, by their attorneys, Bell, Moore & Richter, S.C., through David E. McFarlane and Morgan K. Stippel, hereby give notice of removal of this civil action from state court to the United States District Court for the Eastern District of Wisconsin and state as follows:

1. This action was filed in the Circuit Court for Milwaukee County, Wisconsin, as Case No. 22-CV-3147 on May 16, 2022, and is pending in that court.
2. The action is a diversity action between citizens of different states with an amount in controversy exceeding \$75,000.
3. The United States District Court has original jurisdiction of this action under 28 U.S.C. § 1332.

4. The amount in controversy exceeds \$75,000, exclusive of interest and costs, as shown by the fact that in pre-suit discussions, Plaintiffs rejected a \$90,000 offer.

4. Diversity of citizenship is shown by the following facts: (a) Plaintiffs Jonathan and Aubrey Carrero are domiciled in New Berlin, Wisconsin and are citizens of Wisconsin; (b) Defendant Mark Tessendorf is domiciled in Rockford, Illinois and is a citizen of Illinois; (c) Defendant C.H. Hall Trucking Inc. is incorporated in Illinois and has its principal place of business in Stillman Valley, Illinois making it a citizen of Illinois; and (d) Defendant AEGIS Security Insurance Company #33898 is incorporated in Pennsylvania and has its principal place of business in Harrisburg, Pennsylvania making it a citizen of Pennsylvania.

5. The time for filing this notice of removal has not expired because 30 days have not passed from June 10, 2022, the date on which Defendant AEGIS Security Insurance Company #33898 received its first pleading in the matter, a Summons and Complaint setting forth the claim for relief upon which this action is based. Defendant C.H. Hall Trucking Inc. was served with the Summons and Complaint on June 14, 2022, and upon information and belief, Defendant Mark Tessendorf has not been properly served with the Summons and Complaint.

6. A copy of all process, pleadings, and orders served on Defendants are filed with this notice together with a docket sheet of the pleadings filed to date in the State Court action.

Dated this 6th day of July 2022.

BELL, MOORE & RICHTER, S.C.

/s/ David E. McFarlane

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